

### **Remarks**

Claims 12, 14, 20, 21-29, 32, 33, 35, 36, 42, 67, 70, 72, and 77 have been amended herein. Claims 1-77 remain pending in the application. Claims 1-11 and 30-31 have been withdrawn from consideration. Claims 12-29 and 32-77 have been examined on the merits and rejected. Examined claims 12, 25, 32, 36, 42, 44, 67, and 77 are independent. Reconsideration is respectfully requested. Entry of the amendment is respectfully requested. No new matter has been added. Support for the amendments is found in the Specification, drawings, and original claims.

### **Claim Status**

Claims 12-29 and 32-43 were provisionally rejected under 35 U.S.C. § 101 as claiming the same invention as that in claims 12-29 and 32-43 of application 09/981,718.

Claims 20, 32-35, and 57-65 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite.

Claims 67-76 were rejected as anticipated under 35 U.S.C. § 102(e) by Coutts (US 6,311,165).

Claims 12-17, 21-29, 32-42, 44-54, and 57-63 were rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave (1992 IEEE, "Proxies, Application Interfaces, and Distributed Systems").

Claims 18-20, 43, and 64-65 were rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave and "Official Notice".

Claims 55-56 were rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave and Hanna (US 6,761,308).

Claim 66 was rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave and McGann ("Portable ATM allows broad deployment", *Bank Systems & Technology*, 5/1997).

Claim 77 was rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of McGann.

Applicants respectfully traverse all of the rejections.

### **The 35 U.S.C. § 101 Rejections**

Claims 12-29 and 32-43 were provisionally rejected under 35 U.S.C. § 101 as claiming the same invention as that in claims 12-29 and 32-43 of application 09/981,718. These rejections are respectfully traversed.

It appears that the Office confuses the recited subject matter with a different application. For example, claims 12-24, 26-29, and 32-43 are not pending in application 09/981,718. Claims 25 and 44-119 are pending in application 09/981,718. Thus, the rejections based on claims 12-24, 26-29, and 32-43 in application 09/981,718 are moot. The 35 U.S.C. § 101 rejection based on claim 25 in application 09/981,718 remains.

The rejections are unclear as they do not specify which of the claims 12-29 and 32-43 correspond to the invention set forth in claim 25 of application 09/981,718.

The rejections are based on 35 U.S.C. § 101 as claiming the same invention. "Same invention" means "identical subject matter" according to MPEP 804 (II) (A). However, none of the original forms of claims 12-29 and 32-43 recite the identical subject matter of claim 25 in

application 09/981,718. Thus, Applicants respectfully submit that the 35 U.S.C. § 101 rejections are improper.

In addition, claims 12-29 and 32-43 have been further amended to include subject matter recited in claim 66. Thus claims 12-29 and 32-43 recite further subject matter which is not identical in scope to claim 25 in application 09/981,718.

### **The 35 U.S.C. § 112, Second Paragraph, Rejections**

Claims 20, 32-35, and 57-65 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite. These rejections are respectfully traversed.

Applicants respectfully submit that the original forms of claims 20, 32-35 support the statutory mandate and are clear in view of the Specification. Nevertheless to ensure that these claims are as clear as possible, amendments were made to these claims as follows:

- Claim 20 was amended to remove the term "proximate" objected to in the Action.
- Claim 32 was amended to replace "transaction method" with "method call".  
Support for invoking a method call of a service proxy via a user interface is found on page 21, lines 16-18.
- Claims 32, 33 and 35 were amended to remove the element of "user interface component" objected to in the Action.
- Claim 35 was amended to replace "third message" with "message". Support for a message sent from a user interface service to a lookup service is found in the Specification page 20, lines 28-30 and Figure 7.

These amendments do not narrow the scope of the recited subject matter.

In addition, claims 57-65 were alleged to be indefinite because of the term "indicia". Claim 57 refers to an interface menu outputted through a display device. The interface menu includes indicia. The indicia corresponds to at least one transaction function. A transaction function can be performed responsive to input that corresponds to its indicia. The specification describes how indicia can be output for the interface menu (e.g., page 33, lines 1-11). The specification also describes how a transaction function can be selected from interface menu (598, 626, 900) indicia representative of transaction functions (e.g., page 33, lines 1-11), such as transfer (902), withdrawal (904), and deposit (906) transaction functions (Figure 26). Thus, claims 57-65 are not indefinite.

Applicants respectfully submit that all of the claims are clear and definite. Withdrawal of the 35 U.S.C. § 112, second paragraph rejections is respectfully requested.

#### **The 35 U.S.C. § 102(e) Rejections**

Claims 67-76 were rejected as anticipated under 35 U.S.C. § 102(e) by Coutts (US 6,311,165). These rejections are respectfully traversed.

#### **Claim 67**

Claim 67 is an independent claim directed to a method. Applicants respectfully submit that Coutts does not anticipate claim 67. Nowhere does Coutts disclose or suggest at least the following steps recited in claim 67:

- **operatively connecting a personal automated transaction machine and a host system, wherein the personal automated transaction machine is a handheld computing device;**
- **receiving with the machine at least one transaction service proxy from the host system, wherein the transaction service proxy corresponds to a transaction service of the host system;**
- **acquiring account information from a data store in the machine; and**
- **performing the selected transaction function through operation of the host responsive to the transaction service proxy and the account information.**

The portions of Coutts referenced in the Action regarding claim 67 discuss a non-handheld ATM (11, 21) that is connected with a legacy host (18, 28) through a server (16, 26) (Figures 2, 4a, 4b). Coutts describes his ATM as including devices such as a receipt printer (14) and a cash dispenser (15) (Column 8, lines 57-65). Nowhere does Coutts disclose or suggest that his ATM corresponds to a handheld computing device. Further a description of an ATM that includes bulky devices such as a cash dispenser and a receipt printer does not disclose or suggest to one skilled in the art a personal automated transaction machine that is handheld.

In addition, nowhere does Coutts disclose or suggest the recited step (b) of receiving with a personal automated transaction machine in the form of a handheld computing device, at least one transaction service proxy from the host system, wherein the transaction service proxy corresponds to a transaction service of the host system.

Further, nowhere does Coutts disclose or suggest the recited step (e) of acquiring account information from a data store in a personal automated transaction machine in the form of a handheld computing device.

Also, nowhere does Coutts disclose or suggest the recited step (f) of performing a selected transaction function through operation of the host responsive to the transaction service proxy and the account information acquired from a data store in a personal automated transaction machine in the form of a handheld computing device.

In addition to Coutts not disclosing or suggesting each of the features recited in claim 67, it is respectfully submitted that the other references cited in the Action also do not disclose or suggest each of the recited features in claim 67. For example, McGann is directed to a portable ATM. Portability is achieved by using a cellular connection. However, the described ATM still includes bulky devices capable of dispensing cash. Thus, the described portable ATM does not correspond to a handheld device. Further the described portable ATM does not suggest to one skilled in the art any apparent need or ability to produce a portable ATM in the form of a handheld device.

In addition, the Action asserts that "Coutts teaches receiving with the machine at least one transaction service proxy from the host system" and references the following sections of Coutts to support this assertion: Column 34, line 51 - column 35, line 4; Column 39, lines 38-49; Column 41, lines 15-33; and Column 11, lines 21-33.

However, even with respect to non-held ATM's, none of these sections discloses or suggests that the system of Coutts includes a transaction service proxy. For example, referenced column 34, line 51 - column 35, line 4 of Coutts discusses that modules may include web server

interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a transaction service proxy. For example, the described proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "transaction service proxy" recited in claim 67 is not a server, but rather is a software component that corresponds to a transaction service of the host system. Nowhere does Coutts disclose or suggest a "transaction service proxy" or any other software component corresponding to a transaction service (or a module) in a host, that is received by a hand held device. Further nowhere does Coutts disclose or suggest a transaction service proxy received by a hand-held device that causes a host from which the transaction service proxy was acquired to perform a transaction function.

The Action also referenced column 39, lines 38-49 of Coutts which discusses that the central server acts as a proxy server to a legacy host function. In addition the Action referenced column 41, lines 15-33 of Coutts which discusses use of a proxy server for servicing connecting computing terminal devices ('clients') on a network. Further the Action referenced, column 11, lines 21-33 of Coutts which discusses that a network can be capable of downloading software from a server (16). However again these described features do not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described "proxy server" is ever capable of being acquired by a handheld computing device from a host system for use by the handheld computing device to cause the host system to carry out a transaction function.

Coutts does not disclose each and every element of the claimed invention arranged in the manner recited in the claims, as is required to sustain the rejection. Hence, Applicants' claim 1 patentably distinguishes over Coutts. Therefore, it is respectfully submitted that the 35 U.S.C. § 102(b) rejection has been overcome. It follows that claims 68-76 which depend from claim 1 are likewise allowable.

### **The 35 U.S.C. § 103(a) Rejections**

#### **Hanna Does Not Qualify As Prior Art**

Claims 55-56 were rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave and Hanna (US 6,761,308). In accordance with 35 U.S.C. § 103(c), Hanna cannot preclude patentability of the present invention. The present application and the Hanna reference were, at the time the invention was made, owned by, or subject to an obligation of assignment, to the same entity. Thus, Hanna is disqualified as prior art in relation to the present invention with regard to 35 U.S.C. § 103(a). See MPEP § 706.02(l)(1). Withdrawal of the rejections of claims 55 and 56 is respectfully requested.

#### **Coutts In View Of Dave and/or Official Notice Does Not Render The Claims Obvious**

Claims 12-17, 21-29, 32-42, 44-54, and 57-63 were rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave (1992 IEEE, "Proxies, Application Interfaces, and Distributed Systems"). Also claims 18-20, 43, and 64-65 were rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave and further in view of "Official Notice". These rejections are respectfully traversed.



### Claim 12

Claim 12 is an independent claim directed to an automated transaction machine. Neither Coutts nor Dave discloses or suggests all of the features and relationships recited in claim 12. Thus the Office has not established *prima facie* obviousness. For example, nowhere does Coutts or Dave disclose or suggest at least the following features recited in claim 12:

- **wherein the ATM includes at least one transaction service in operative connection with the network . . . wherein the transaction service includes a service proxy software component, wherein the transaction service is operative to send a first copy of the service proxy to the lookup service**
- **wherein the second copy of the service proxy is adapted to operate responsive to the user interface software component included in the portable device to cause the transaction service included in the ATM to operate to cause the ATM to perform a transaction function.**

Coutts is directed to an ATM that connects to a server through a network to receive module software. Dave is directed to proxy objects in a distributed system. However, neither Coutts nor Dave discloses or suggests an ATM or a transaction service in an ATM that is capable of enabling a portable device to cause a transaction service in the ATM to cause the ATM to carry out a transaction function in the manner recited in claim 12.

The Action asserts that "Coutts teaches a service proxy" and references the following sections of Coutts to support this assertion: Column 34, line 51 - column 35, line 4; Column 39, lines 38-49; Column 41, lines 15-33; and Column 11, lines 21-33.

However, none of these sections discloses or suggests that the system of Coutts includes a service proxy. For example, referenced column 34, line 51 - column 35, line 4 of Coutts discusses that modules may include web server interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a service proxy. For example, the described proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "service proxy" recited in claim 12 is not a server, but rather is a software component included in the transaction service, for which a copy is sent to a lookup service in the machine. Nowhere does Coutts disclose or suggest a "service proxy" or any other software component in one of its modules that is copied and sent to a lookup service. Further nowhere does Coutts disclose or suggest a "service proxy" or any other software component that is copied from a transaction service and is acquired by a user interface software component of a portable device. Further nowhere does Coutts disclose or suggest a copy of a service proxy from a transaction service in an ATM is ever acquired and operated by a user interface software component of a portable device to cause the transaction service to operate to cause the ATM to perform a transaction function.

The Action also referenced column 39, lines 38-49 of Coutts which discusses that the central server acts as a proxy server to a legacy host function. In addition the Action referenced column 41, lines 15-33 of Coutts which discusses use of a proxy server for servicing connecting computing terminal devices ('clients') on a network. Further the Action referenced column 11,

lines 21-33 of Coutts which discusses that a network can be capable of downloading software from a server (16). However again these described features do not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described "proxy server" is ever capable of being copied. Further, nowhere does Coutts disclose or suggest that a copy of his described proxy server is ever capable of being sent from a module to a lookup service that enables a portable device to acquire a copy of the service proxy for use with causing the module to cause the ATM to carry out a transaction function.

In addition, the Action admits that Coutts does not teach "a service proxy to the lookup service". However, the Action asserts that Dave teaches these features and that it would have been obvious to modify Coutts to include the details of a lookup service and a service proxy to a lookup server. Applicants respectfully disagree. As discussed previously, Coutts does not teach multiple "service proxies" as asserted in the Action as a basis for combining Coutts and Dave. Therefore it would not be obvious to combine Dave and Coutts. None of the various "proxy servers" described in Coutts are analogous in structure or function to the "service proxy" recited in claim 12 or the "proxy" described in Dave. A teaching of using "proxy servers" in Coutts, does not disclose or suggest any apparent reason to use in Coutts the recited "service proxies" or the "proxies" discussed in Dave.

In addition even it were theoretically possible to combine Coutts and Dave (although there is no apparent reason to do so) the combination would still not disclose or suggest all of the features recited in claim 12. For example, in the "Creating new remote object" section of Dave on page 218, Dave discusses that a "construct routine" of an "ObjectServer" is invoked by an application to create a RemoteProxy object for a remote object. However, such a method of

creating a RemoteProxy does not correspond to the subject matter recited in claim 12. Nowhere does this portion of Dave or any other portion of Dave disclose or suggest a RemoteProxy or any other proxy that is included in a transaction service and a copy of which is sent to a lookup service (or a Nameserver) which enables the copy of the service proxy to be acquired by a portable device (or an application) for use with operating the transaction service.

The applied references do not disclose or suggest each of the features and relationships recited in claim 12 and the Office has not established *prima facie* obviousness. Also, as nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because the applied art includes no apparent reasons for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that claim 12 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 13-24 which depend from claim 12 are likewise allowable.

#### **Claim 25**

Claim 25 is an independent claim directed to a method. Neither Coutts nor Dave discloses or suggests all of the features, relationships, and steps recited in claim 25. Thus the Office has not established *prima facie* obviousness. For example, nowhere does Coutts or Dave disclose or suggest at least the following features and steps recited in claim 25:

- **wherein the transaction service includes therein at least one transaction function device and a service proxy software component,**

- **storing a copy of the service proxy in association with the lookup service;**
- **sending a copy of the service proxy from the lookup service to the portable device;**
- **operating the transaction function device of the transaction service responsive to a method of the copy of the service proxy being invoked through operation of the portable device.**

Coutts is directed to an ATM that connects to a server through a network to receive module software. Dave is directed to proxy objects in a distributed system. However, neither Coutts nor Dave discloses or suggests an ATM or a transaction service in an ATM that is capable of enabling a portable device to cause a transaction function device in the ATM to operate in the manner recited in claim 25.

The Action asserts that "Coutts teaches invoking a method of the service proxy through operation of the interface service responsive to the at least one input" and references the following sections of Coutts to support this assertion: Column 34, line 51 - column 35, line 13; and Column 39, lines 37-49;

However, none of these sections discloses or suggests that the system of Coutts includes a service proxy. For example, referenced column 34, line 51 - column 35, line 13 of Coutts discusses that modules may include web server interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a service proxy.

For example, the described proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "service proxy" recited in claim 25 is not a server, but rather is a software component included in the transaction service, for which a copy is stored in a lookup service in the machine. Nowhere does Coutts disclose or suggest a "service proxy" or any other software component in one of its modules that is copied and stored in a lookup service. Further nowhere does Coutts disclose or suggest a copy of a "service proxy" or any other software component that is sent to a portable device. Further nowhere does Coutts disclose or suggest a copy of a service proxy from a transaction service in an ATM is ever sent to a portable device capable of invoking a method of the copy of the service proxy to cause a transaction function device of the transaction service to operate.

The Action also referenced column 39, lines 38-49 of Coutts which discusses that the central server acts as a proxy server to a legacy host function. However this described "proxy server" in Coutts does not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described proxy server is ever capable of being copied. Further, nowhere does Coutts disclose or suggest that a copy of his described proxy server is ever capable of being stored in a lookup service and sent to a portable device for use with operating the module in the ATM.

In addition, the Action admits that Coutts does not teach a "service proxy to the lookup service". However, the Action asserts that Dave teaches these features and that it would have been obvious to modify Coutts to include the details of a lookup service and getting a copy of a service proxy. Applicants respectfully disagree. As discussed previously, Coutts does not teach

multiple "service proxies" as asserted in the Action as a basis for combining Coutts and Dave. Therefore it would not be obvious to combine Dave and Coutts. None of the various "proxy servers" described in Coutts are analogous in structure or function to the "service proxy" recited in claim 25 or the "proxy" described in Dave. A teaching of using "proxy servers" in Coutts, does not disclose or suggest any apparent reason to use in Coutts the recited "service proxies" or the "proxies" discussed in Dave.

In addition even it were theoretically possible to combine Coutts and Dave (although there is no apparent reason to do so) the combination would still not disclose or suggest all of the features recited in claim 25. For example, in the "Creating new remote object" section of Dave on page 218, Dave discusses that a "construct routine" of an "ObjectServer" is invoked by an application to create a RemoteProxy object for a remote object. However, such a method of creating a RemoteProxy does not correspond to the subject matter recited in claim 25. Nowhere does this portion of Dave or any other portion of Dave disclose or suggest a RemoteProxy or any other proxy that is included in a transaction service and a copy of which is stored in a lookup service (or a Nameserver) which sends the copy of the service proxy to a portable device (or an application) for use with operating the transaction service.

The applied references do not disclose or suggest each of the features, relationships, and steps recited in claim 25 and the Office has not established *prima facie* obviousness. Also, as nothing in the cited art discloses or suggests the features, relationships, and steps that are specifically recited in the claim, and because the applied art includes no apparent reasons for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that claim 25 is allowable for these reasons. Therefore, it is respectfully

submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 26-29 which depend from claim 25 are likewise allowable.

### **Claim 32**

Claim 32 is an independent claim directed to a method. Neither Coutts nor Dave discloses or suggests all of the features, relationships, and steps recited in claim 32. Thus the Office has not established *prima facie* obviousness. For example, nowhere does Coutts or Dave disclose or suggest at least the following features and steps recited in claim 32:

- **wherein the transaction service component includes a service proxy software component;**
- **registering the transaction service component with the lookup service responsive to the second message, including sending a first copy of the service proxy to the lookup service;**
- **sending a second copy of the service proxy from the lookup service to the portable device;**
- **receiving with the transaction service from the portable device an invoked method call of the second copy of the service proxy; and**
- **performing a transaction function with the ATM through operation of the transaction service component responsive to the invoked method call.**



Coutts is directed to an ATM that connects to a server through a network to receive module software. Dave is directed to proxy objects in a distributed system. However, neither Coutts nor Dave discloses or suggests an ATM or a transaction service component in an ATM that is capable of enabling a portable device to cause the transaction function service component to perform a transaction function in the manner recited in claim 32.

The Action asserts that "Coutts teaches a service proxy" and references the following sections of Coutts to support this assertion: column 34, line 51 - column 35, line 4; and column 39, lines 37-49; column 41, lines 15-33; and column 11, lines 21-33.

However, none of these sections discloses or suggests that the system of Coutts includes a service proxy. For example, referenced column 34, line 51 - column 35, line 4 of Coutts discusses that modules may include web server interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a service proxy. For example, the described proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "service proxy" recited in claim 32 is not a server, but rather is a software component included in the transaction service component, for which a copy is sent to a lookup service in the machine. Nowhere does Coutts disclose or suggest a "service proxy" or any other software component in one of its modules that is copied and sent to a lookup service. Further nowhere does Coutts disclose or suggest a copy of a "service proxy" or any other software component that is sent to a portable device. Further

nowhere does Coutts disclose or suggest a copy of a service proxy from a transaction service component in an ATM is ever sent to a portable device capable of invoking a method of the copy of the service proxy to cause the transaction service component to perform a transaction function.

The Action also referenced column 39, lines 38-49 of Coutts which discusses that the central server acts as a proxy server to a legacy host function. In addition the Action referenced column 41, lines 15-33 of Coutts which discusses use of a proxy server for servicing connecting computing terminal devices ('clients') on a network. Further the Action referenced column 11, lines 21-33 of Coutts which discusses that a network can be capable of downloading software from a server (16). However again these described features do not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described proxy server is ever capable of being copied. Further, nowhere does Coutts disclose or suggest that copies of his described proxy server are ever capable of being sent to a lookup service and then a portable device for use with operating the module in the ATM.

In addition, the Action admits that Coutts does not teach "acquiring copies from the lookup service". However, the Action asserts that Dave teaches this features and that it would have been obvious to modify Coutts to include the details of a lookup service and getting copies of a service proxy. Applicants respectfully disagree. As discussed previously, Coutts does not teach multiple "service proxies" as asserted in the Action as a basis for combining Coutts and Dave. Therefore it would not be obvious to combine Dave and Coutts. None of the various "proxy servers" described in Coutts are analogous in structure or function to the "service proxy" recited in claim 32 or the "proxy" described in Dave. A teaching of using "proxy servers"

in Coutts, does not disclose or suggest any apparent reason to use in Coutts the recited "service proxies" or the "proxies" discussed in Dave.

In addition even it were theoretically possible to combine Coutts and Dave (although there is no apparent reason to do so) the combination would still not disclose or suggest all of the features recited in claim 32. For example, in the "Creating new remote object" section of Dave on page 218, Dave discusses that a "construct routine" of an "ObjectServer" is invoked by an application to create a RemoteProxy object for a remote object. However, such a method of creating a RemoteProxy does not correspond to the subject matter recited in claim 32. Nowhere does this portion of Dave or any other portion of Dave disclose or suggest a RemoteProxy or any other proxy that is included in a transaction service component and a copy of which is sent to a lookup service (or a Nameserver) which sends the copy of the service proxy to a portable device (or an application) for use with causing the transaction service component to perform a transaction function.

The applied references do not disclose or suggest each of the features, relationships, and steps recited in claim 32 and the Office has not established *prima facie* obviousness. Also, as nothing in the cited art discloses or suggests the features, relationships, and steps that are specifically recited in the claim, and because the applied art includes no apparent reasons for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that claim 32 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 33-35 which depend from claim 32 are likewise allowable.

### **Claim 36**

Claim 36 is an independent claim directed to an automated transaction machine. Neither Coutts nor Dave discloses or suggests all of the features and relationships recited in claim 36. Thus the Office has not established *prima facie* obviousness. For example, Coutts and Dave do not disclose or suggest an automated transaction machine that includes at least the following features recited in claim 36:

- **a transaction service including a processor . . and a service proxy software component in operative connection with the processor,**
- **wherein the processor is operative to cause a copy of a service proxy to be delivered to the at least one other service, and**
- **wherein the service proxy in the at least one other service is operative to cause at least one command to be communicated to the processor,**
- **wherein the processor is operative responsive to the command to cause the transaction device to perform a transaction function.**

The Action asserts that "Coutts teaches a service proxy software component in operative connection with the processor" and references the following sections of Coutts to support this assertion: column 3, lines 6 - column 4, line 55; column 34, line 51 - column 35, line 4; column 39, lines 38-49; column 41, lines 15-33; and column 11, lines 21-33.

However, none of these sections discloses or suggests that the system of Coutts includes a service proxy. For example, column 3, lines 6 - column 4, line 55 of Coutts discusses that software for controlling modules may be in the form of byte code or applets downloaded from a

central server. This referenced portion of Coutts does not disclose or suggest that such software is ever in the form of a service proxy.

Referenced column 34, line 51 - column 35, line 4 of Coutts discusses that the modules may include web server interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a service proxy. For example, the described proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "service proxy" recited in claim 36 is not a server, but rather is a software component included in the transaction service, for which a copy is delivered to at least one other service in the machine. Nowhere does Coutts disclose or suggest a "service proxy" or any other software component in one of its modules that is copied and delivered to at least one other service in the ATM of Coutts. Further nowhere does Coutts disclose or suggest a "service proxy" or any other software component copied from a transaction service that is operative in the at least one other service to cause at least one command to be communicated to the processor of the transaction service which causes a transaction device in the transaction service to perform a transaction function.

The Action also referenced column 39, lines 38-49 of Coutts which discusses that the central server acts as a proxy server to a legacy host function. In addition the Action referenced column 41, lines 15-33 of Coutts which discusses use of a proxy server for servicing connecting computing terminal devices ('clients') on a network. Further the Action referenced, column 11,

lines 21-33 of Coutts which discusses that a network can be capable of downloading software from a server (16). However again these described features do not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described "proxy server" is ever capable of being copied. Further, nowhere does Coutts disclose or suggest that a copy of his described proxy server is ever capable of being delivered to another service in the ATM of Coutts, and be used to provide commands for controlling a transaction function device in the service for which the proxy service is originally included.

In addition, it would not be obvious to combine Dave and Coutts. None of the various "proxy servers" described in Coutts are analogous in structure or function to the "service proxy" recited in claim 36 or the "proxy" described in Dave. A teaching of using "proxy servers" in Coutts does not disclose or suggest any apparent reason to use in Coutts the recited "service proxies" or the "proxies" discussed in Dave.

In addition even it were theoretically possible to combine Coutts and Dave (although there is no apparent reason to do so) the combination would still not disclose or suggest all of the features recited in claim 36. For example, in the "Creating new remote object" section of Dave on page 218, Dave discusses that a "construct routine" of an "ObjectServer" is invoked by an application to create a RemoteProxy object for a remote object. However, such a method of creating a RemoteProxy does not correspond to the subject matter recited in claim 36. Nowhere does this portion of Dave or any other portion of Dave disclose or suggest a RemoteProxy or any other proxy that is included in a transaction service and a copy of which is delivered to another service (or application) for use with communicating commands to a processor of the transaction service.

The applied references do not disclose or suggest each of the features and relationships recited in claim 36 and the Office has not established *prima facie* obviousness. Also, as nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because the applied art includes no apparent reasons for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that claim 36 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 37-41 which depend from claim 36 are likewise allowable.

#### **Claim 42**

Claim 42 is an independent claim directed to an automated transaction machine. Neither Coutts nor Dave discloses or suggests all of the features and relationships recited in claim 42. Thus the Office has not established *prima facie* obviousness. For example, Coutts and Dave do not disclose or suggest an automated transaction machine that includes at least the following features recited in claim 42:

- **a processor, wherein the processor is in operative connection with a lookup service and a transaction service through a network, wherein the transaction service includes a service proxy, wherein the lookup service includes a copy of the service proxy of the transaction service;**

- **wherein the application software component is operative to cause the processor to receive a copy of the service proxy from the lookup service responsive to the lookup search message, and**
- **wherein the application software component is operative to invoke at least one method of the copy of the service proxy, the method being operative to cause the transaction service to cause the machine to perform a transaction function.**

The Action asserts that "Coutts teaches wherein the processor is in operative connection with a transaction service through a network, which includes a service proxy of the transaction service" and references the following sections of Coutts to support this assertion: column 3, lines 6 - column 4, line 55; column 26, lines 30-54; column 29, lines 16-31; column 30, lines 2-10.

However, none of these sections discloses or suggests that the system described in Coutts discloses or suggests a "service proxy" of a transaction service. For example, column 3, line 6 - column 4, line 55 of Coutts discusses that software for controlling modules may be in the form of byte code or applets downloaded from a central server. This referenced portion of Coutts does not disclose or suggest that such software is ever in the form of a service proxy.

Column 34, line 51 - column 35, line 4 of Coutts discusses that the modules may include web server interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a service proxy. For example, the described



proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "service proxy" recited in claim 42 is not a server, but rather is a software component included in the transaction service, for which a copy is included in a lookup service and is received by a processor in the machine. Nowhere does Coutts disclose or suggest a "service proxy" or any other software component in a module that is copied and received by a processor in the ATM of Coutts. Further, nowhere does Coutts disclose or suggest a "service proxy" or any other software component copied from a transaction service that has a method capable of being invoked to cause the transaction service to cause the machine to perform a transaction function.

The Action also referenced column 26, lines 30-54 of Coutts which discusses that the benefits of "Thin Client technology". In addition the Action referenced column 29, lines 16-31 of Coutts which discusses use of a Java processor. Further the Action referenced column 30, lines 2-10 of Coutts which discusses that a Java processor would be ideal for transaction terminal modules such as card readers and receipt printers. However again these described features do not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described "proxy server" or java processors are ever capable of being copied. Further, nowhere does Coutts disclose or suggest that a copy of his described proxy server or Java processor is ever capable of being received by a processor in the ATM of Coutts for purposes of invoking a method that causes the associated transaction service to cause the machine to perform a transaction function.

In addition, the Action admits that Coutts does not teach a lookup service. However, the action asserts that Dave teaches these features and that it would have been obvious to modify Coutts to include the details of a lookup service and a service proxy to the lookup service. Applicants respectfully disagree. As discussed previously, Coutts does not teach multiple "service proxies" as asserted in the Action as a basis for combining Coutts and Dave. Therefore it would not be obvious to combine Dave and Coutts. None of the various "proxy servers" described in Coutts are analogous in structure or function to the "service proxy" recited in claim 42 or the "proxy" described in Dave. A teaching of using "proxy servers" in Coutts does not disclose or suggest any apparent reason to use in Coutts the recited "service proxies" or the "proxies" discussed in Dave.

In addition even it were theoretically possible to combine Coutts and Dave (although there is no apparent reason to do so) the combination would still not disclose or suggest all of the features recited in claim 42. For example, in the "Creating new remote object" section of Dave on page 218, Dave discusses that a "construct routine" of an "ObjectServer" is invoked by an application to create a RemoteProxy object for a remote object. However, such a method of creating a RemoteProxy does not correspond to the subject matter recited in claim 42. Nowhere does this portion of Dave or any other portion of Dave disclose or suggest a RemoteProxy or any other proxy that is included in a transaction service and a copy of which is included in a lookup service (or a Nameserver) and received from the lookup service by a processor for use with causing the transaction service to perform a transaction function.

The applied references do not disclose or suggest each of the features and relationships recited in claim 42 and the Office has not established *prima facie* obviousness. Also, as nothing

in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because the applied art includes no apparent reasons for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that claim 42 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claim 43 which depends from claim 42 is likewise allowable.

#### **Claim 44**

Claim 44 is an independent claim directed to an automated transaction machine. Neither Coutts nor Dave discloses or suggests all of the features and relationships recited in claim 44. Thus the Office has not established *prima facie* obviousness. For example, Coutts and Dave do not disclose or suggest an automated transaction machine that includes at least the following features recited in claim 44:

- **wherein the processor is operative to acquire from the host a copy of a first service proxy that originates from the at least one service (included in the host)**
- **a data store in operative connection with the processor, wherein the data store includes account information corresponding to at least one account,**
- **wherein the processor is operative responsive to the first service proxy to cause the at least one service to perform a transaction function responsive to the account information.**

The Action asserts that "Coutts teaches . . . the processor is operative to acquire from the host a copy of a first service proxy that originates from the at least one service" and references the following sections of Coutts to support this assertion: column 3, lines 6 - column 4, line 55; column 34, line 51 - column 35, line 4; column 39, lines 38-49; column 41, lines 15-33; and column 11, lines 21-33.

However, none of these sections discloses or suggests that the system of Coutts includes a service proxy. For example, Column 3, lines 6 - column 4, line 55 of Coutts discusses that software for controlling modules may be in the form of byte code or applets downloaded from a central server. This referenced portion of Coutts does not disclose or suggest that such software is ever in the form of a service proxy.

Referenced column 34, line 51 - column 35, line 4 of Coutts discusses that the modules may include web server interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a service proxy. For example, the described proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "first service proxy" recited in claim 44 is not a server, but rather is a software component "that originates from the at least one service" in the machine, and which causes a processor that acquired it to cause the at least one service in the machine to perform a transaction function.

Nowhere does Coutts disclose or suggest a "service proxy" or any other software component that is a copy that originates from a service in the ATM and is acquired by a processor in the machine. Further nowhere does Coutts disclose or suggest a "service proxy" or any other software component that is a copy that originates from a service in the ATM and is used by a processor to cause the service to perform a transaction function.

The Action also referenced column 39, lines 38-49 of Coutts which discusses that the central server acts as a proxy server to a legacy host function. In addition the Action referenced column 41, lines 15-33 of Coutts which discusses use of a proxy server for servicing connecting computing terminal devices ('clients') on a network. Further the Action referenced column 11, lines 21-33 of Coutts which discusses that a network can be capable of downloading software from a server (16). However again these described features do not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described "proxy server" is ever capable of being copied. Further, nowhere does Coutts disclose or suggest that a copy of his described proxy server is ever capable of being acquired by a processor in the ATM of Coutts, and be used to cause a transaction function to be carried out by the service for which the proxy service is originated.

In addition it would not be obvious to combine Coutts with Dave. None of the various "proxy servers" described in Coutts are analogous in structure or function to the "service proxy" recited in claim 44 or the "proxy" described in Dave. A teaching of using "proxy servers" in Coutts does not disclose or suggest any apparent reason to use in Coutts the recited "service proxies" or the "proxies" discussed in Dave.

In addition even it were theoretically possible to combine Coutts and Dave (although there is no apparent reason to do so) the combination would still not disclose or suggest all of the features recited in claim 44. For example, in the "Creating new remote object" section of Dave on page 218, Dave discusses that a "construct routine" of an "ObjectServer" is invoked by an application to create a RemoteProxy object for a remote object. However, such a method of creating a RemoteProxy does not correspond to the subject matter recited in claim 44. Nowhere does this portion of Dave or any other portion of Dave disclose or suggest a RemoteProxy or any other proxy that originates from a service, and causes a processor that acquired the service proxy to cause the service to perform a transaction function.

In addition neither Coutts nor Dave disclose or suggest the features recited in claim 44 with respect to the manner in which the recited account information is used. For example nowhere does Coutts or Dave disclose or suggest an automated transaction machine with a processor that is operative responsive to a copy of the first service proxy originating from at least one service in the machine to cause the at least one service to perform a transaction function responsive to account information stored in a data store in the machine.

The applied references do not disclose or suggest each of the features and relationships recited in claim 44 and the Office has not established *prima facie* obviousness. Also, as nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because the applied art includes no apparent reasons for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that claim 44 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a)

rejection should be withdrawn. It follows that claims 45-66 which depend from claim 44 are likewise allowable.

#### **Coutts In View Of McGann Does Not Render Claim 77 Obvious**

Claim 77 was rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of McGann. This rejection is respectfully traversed.

#### **Claim 77**

Claim 77 is an independent claim directed to an automated transaction machine. Neither Coutts nor McGann discloses or suggests all of the features and relationships recited in claim 77. Thus the Office has not established *prima facie* obviousness. For example, Coutts and McGann do not disclose or suggest an automated transaction machine that includes at least the following features recited in claim 77:

- **enabling a connection between a portable personal automated transaction machine and a host terminal, the host terminal including at least one transaction service, the transaction service including a sheet dispenser, wherein the portable personal automated transaction machine is a handheld device;**
- **sending to the machine, a transaction service proxy from the host terminal, the transaction service proxy corresponding to the transaction service;**
- **dispensing at least one sheet from the sheet dispenser in the host terminal responsive to operation of the transaction service proxy in the machine.**

The Action admits that Coutts does not teach a portable personal automated machine. Further Applicants respectfully submit that Coutts also does not disclose or suggest a portable personal automated banking machine that is a handheld device. For example, the portions of Coutts referenced in the Action regarding claim 77 discuss a non-handheld ATM (11, 21) that is connected with a legacy host (18, 28) through a server (16, 26) (Figures 2, 4a, 4b). Coutts describes his ATM as including devices such as a receipt printer (14) and a cash dispenser (15) (column 8, lines 57-65). Nowhere does Coutts disclose or suggest that his ATM corresponds to a handheld device. Further a description of an ATM that includes bulky devices such as a cash dispenser and a receipt printer does not disclose or suggest to one skilled in the art the step of connecting a handheld device to a host system.

In addition McGann also does not disclose or suggest these recited features. For example, McGann is directed to a portable ATM. Portability is achieved by using a cellular connection. However, the described ATM still includes bulky devices capable of dispensing cash. The described portable ATM does not correspond to a handheld device. Further the described portable ATM does not suggest to one skilled in the art any apparent need or ability to produce a portable ATM in the form of a handheld device. Thus neither Coutts nor McGann disclose or suggest each of the features recited in claim 77. Thus the Office has not established *prima facie* obviousness.

In addition, nowhere does Coutts (or McGann) disclose or suggest the recited step (b) of sending to the machine in the form of a hand held device, a transaction service proxy from the host terminal, the transaction service proxy corresponding to the transaction service in the host terminal.



Further, nowhere does Coutts (or McGann) disclose or suggest dispensing at least one sheet from the sheet dispenser in the host terminal responsive to operation of the transaction service proxy in the machine in the form of a handheld device.

In addition, the Action asserts that "Coutts teaches . . . service proxy software . . . receiving with the machine, a transaction service proxy from the host terminal, the transaction service proxy corresponding to the transaction service" and references the following sections of Coutts to support these assertions: column 34, line 51 - column 35, line 4; column 39, lines 38-49; column 41, lines 15-33; and column 11, lines 21-33.

However, even with respect to non-held ATM's none of these sections discloses or suggests that the system of Coutts includes a transaction service proxy. For example, referenced column 34, line 51 - column 35, line 4 of Coutts discusses that modules may include web server interfaces or proprietary interfaces by way of a proxy server. Such a proxy server allows each module to be queried for information on the status of the module by a remote client interface. Examples of clients include web browsers or a Hot Java browser. However none of these described features in Coutts correspond to a transaction service proxy. For example, the described proxy server in this portion of Coutts corresponds to a web or proprietary interface provided on the module that is accessed via a browser to provide status information regarding the module. In contrast, the "transaction service proxy" recited in claim 77 is not a server, but rather is a software component that corresponds to a transaction service of the host terminal. Nowhere does Coutts disclose or suggest a "transaction service proxy" or any other software component corresponding to a transaction service (or a module) in a host terminal, that is sent to a hand held

device from the host terminal. Further nowhere does Coutts disclose or suggest a transaction service proxy sent to a hand-held device that causes a host terminal to dispense sheets.

The Action also referenced column 39, lines 38-49 of Coutts which discusses that the central server acts as a proxy server to a legacy host function. In addition the Action referenced column 41, lines 15-33 of Coutts which discusses use of a proxy server for servicing connecting computing terminal devices ('clients') on a network. Further the Action referenced, column 11, lines 21-33 of Coutts which discusses that a network can be capable of downloading software from a server (16). However again these described features do not correspond to the recited "service proxy". Nowhere does Coutts disclose or suggest that its described "proxy server" is ever capable of being sent to a handheld device from a host terminal for use by the handheld device to cause the host terminal to dispense sheets.

The applied references do not disclose or suggest each of the features and relationships, recited in claim 77 and the Office has not established *prima facie* obviousness. Also, as nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because the applied art includes no apparent reasons for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that claim 77 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn.

### **The Dependent Claims**

The Applicants have shown the independent claims to be allowable. Thus, it is asserted that the dependent claims are allowable on the same basis.

Furthermore, each dependent claim additionally recites specific features, relationships, and/or steps that further patentably distinguish these claims. The reference(s) do not teach or suggest the features and relationships that are specifically recited in these claims. Thus, it is respectfully submitted that the dependent claims are further allowable due to the recitation of such additional features, relationships, and/or steps.

#### **Coutts In View Of David and McGann Does Not Render Claim 66 Obvious**

Claim 66 was rejected as obvious under 35 U.S.C. § 103(a) over Coutts in view of Dave and McGann ("Portable ATM allows broad deployment", *Bank Systems & Technology*, 5/1997). This rejection is respectfully traversed.

#### **Claim 66**

Claim 66 depends from claim 44 and recites that the machine further comprises a personal portable device, wherein the personal portable device includes the processor and the data store. In addition claim 66 recites that the machine further comprises a host, wherein the host includes an automated teller machine (ATM). The ATM includes a cash dispenser. In addition, the transaction function includes a dispense of cash from the ATM. Also claim 66 recites that the processor is operative responsive to the first service proxy to cause the ATM to operate the cash dispenser.

The Action admits that neither Coutts nor Dave teaches a portable ATM device. In addition applicants respectfully submit that McGann also does not disclose or suggest a personal portable device with the features recited in claim 66. For example, although McGann is directed

to a portable ATM, nowhere does McGann disclose or suggest that its portable ATM communicates with another ATM (or a host that includes another ATM) to cause the other ATM to operate a cash dispenser to dispense cash.

The Office has not established *prima facie* obviousness with respect to claim 66, and it is respectfully submitted the rejection should be withdrawn.

### **Conclusion**

Applicants respectfully submit that this application is in condition for allowance. The undersigned is willing to discuss any aspect of the application at the Office's convenience.

Respectfully submitted,



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